

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

YIEN-KOO KING,

Plaintiff,

v.

ANDREW WANG, et al.,

Defendant.

**Case No: 14-cv-7694**

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**NOTICE OF MOTION TO EXCLUDE THE  
EXPERT OPINION OF PATRICK REGAN**

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and the Declaration of Akiva Cohen, dated February 26, 2021, and the documents submitted therewith, and upon all prior pleadings and proceedings herein, that Defendants Andrew Wang, et al. respectfully move this Court, before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, for an Order, pursuant to Rules 26(a) and 37(c) of the Federal Rules of Civil Procedure, Rules 403 and 702 of the Federal Rules of Evidence, and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), precluding Plaintiff from offering any evidence or testimony

from its expert witness, Patrick Regan, and for such other and further relief as the Court deems appropriate.

As per the agreement of the Parties in accordance with the Court's Individual Rules, opposition papers, if any, shall be filed on or before March 19, 2021 and shall be limited to 27 pages, and reply papers, if any, shall be filed on or before March 29, 2021 and shall be limited to 15 pages.

Dated: February 26, 2021

Respectfully Submitted,

Kamerman, Uncyk, Soniker & Klein P.C.

/s/ Akiva M. Cohen

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